

HONORABLE JOHN C. COUGHENOUR

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSEPH A. IOPPOLO; DAVID
MCCRAY AND SALLY MCCRAY,
husband and wife; SCOTT KASEBURG
AND KATHRYN KASEBURG,
husband and wife; CAR LOT LLC, a
Washington limited liability company;
FLOOR CRAFT BUILDING LLC, a
Washington limited liability company;
and WOODINVILLE LANDING LLC,
a Washington limited liability company,
for themselves and a Class of Similarly
Situated Plaintiffs,

Plaintiffs,

v.

PORT OF SEATTLE, a municipal
corporation; PUGET SOUND
ENERGY, INC., a Washington for profit
corporation; KING COUNTY, a home
rule charter county; and CENTRAL
PUGET SOUND REGIONAL
TRANSIT AUTHORITY,

Defendants.

No. 2: 15-CV-00358-JCC

DECLARATION OF DON BILLEN IN
SUPPORT OF DEFENDANT SOUND
TRANSIT'S JOINDER OF KING
COUNTY'S MOTION FOR SUMMARY
JUDGMENT TO DISMISS INVERSE
CONDEMNATION CLAIM

I, Don Billen, declare as follows:

1. I have personal knowledge of the facts contained herein; I am over the age of
eighteen; and I am competent to testify thereto.

2. I am the High Capacity Transportation Project Development Director at Sound Transit.
3. I have worked at Sound Transit in various roles since 1997.
4. With the exception of an approximately one-mile stretch of the railbanked corridor in Bellevue, Sound Transit currently has no voter-approved plans to construct any facilities in the railbanked corridor. There is a portion of the railbanked corridor, located approximately between NE 6th Street at the southern end and SR 520 at the northern end, in which Sound Transit plans to construct facilities for the East Link Light Rail system. Sound Transit is also conducting environmental review for a Light Rail Operations Maintenance Satellite Facility which may also be partially located in this portion of the corridor. Sound Transit owns a fee interest in most of that section of the corridor and an easement in the remaining portion.

I DECLARE under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 9th day of July, 2015 at Seattle, Washington



Don Billen

CERTIFICATE OF SERVICE

I, Ruby Fowler, declare that I am employed by the Central Puget Sound Regional Transit Authority, a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On July 9, 2015, I caused a true and correct copy of the foregoing document to be served on counsel listed below in the manner indicated:

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DATED this 9th day of July, 2015.



Ruby Fowler, Legal Secretary